

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

-----X
SAKUNTHALA THALAHITIYA
VITHANALAGE

Plaintiff,

v.

Civ. Action No.: 3:22-cv-06248 (KMW/SAK)

ALIA AL HUNAITY
and IMAD QATARNEH

**NOTICE OF MOTION TO COMPEL
THE PRODUCTION OF TESTIMONY
AND DOCUMENTS**

Defendants.

-----X

PLEASE TAKE NOTICE that on June 25, 2024, or as soon thereafter as counsel may be heard, the undersigned, attorneys for Plaintiff Sakunthala Thalahitiya Vithanalage (“Plaintiff”), with the consent of Defendant Imad Qatarneh, shall move before the Honorable Sharon A. King, U.S.M.J., at the United States District Court for the District of New Jersey, Camden Vicinage, 4th & Cooper Streets, Camden, New Jersey for the entry of an Order to compel the U.S. Department of Homeland Security (“DHS”) and U.S. Immigration and Customs Enforcement (“ICE”) to produce testimony and documents responsive to Plaintiff’s discovery requests made pursuant to the DHS’s *Touhy* regulations, 6 C.F.R. §§ 5.41–5.49 and Federal Rules of Civil Procedure 26 and 45.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the undersigned shall rely on the accompanying Memorandum of Law, the Declaration of David A. Kotler with exhibits attached thereto, and the proceedings on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Dated: June 25, 2024
New York, New York

Respectfully submitted,

By: /s/ David A. Kotler

David A. Kotler

David A. Herman (admitted *pro hac vice*)

Nicholas Gersh (admitted *pro hac vice*)

DECHERT LLP

1095 Avenue of the Americas

New York, New York 10036

Attorneys for Plaintiff